

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA, )  
                                )  
Plaintiff,                 ) 4:22 CR 3077  
                                )  
vs.                         )  
NEIL SURESH CHANDRAN,    ) GOVERNMENT'S MOTION FOR  
                                ) RULE 17(c) SUBPOENA  
                                )  
Defendant.                 )

Comes now the United States of America, pursuant to Rule 17(c) of the Federal Rules of Criminal Procedure, and moves the Court to enter an order authorizing the United States to issue a subpoena duces tecum, which will require production of records in the above-referenced matter. In support of said motion the United States shows the Court:

1.       The subpoena duces tecum will be served on Intuit, Inc. regarding certain documents relating to the accounting records of ViDelivery, Inc., ViMarket, Inc., and Studio Vi, Inc. (companies related to the Defendant). That a copy of the proposed subpoena is attached hereto as Exhibit A.
2.       That the records sought are evidentiary and relevant with respect to each count of the Indictment in the instant case.
3.       That the records are not otherwise procurable by the United States in advance of trial through the exercise of due diligence. The United States previously sought similar records from Owen Cran through a trial subpoena, Dkt. 25, but Mr. Cran indicated that he was no longer an employee of the relevant companies and thus claimed that he did not have legal access to the data.
4.       That the records are necessary to enable both parties to properly prepare for trial.

5. That this application is made in good faith as the requested documents are believed to exist.

Wherefore, the United States prays for an Order authorizing the issuance of the subpoena duces tecum to Intuit, Inc.

RESPECTFULLY SUBMITTED,

LORINDA I. LARYEA  
ACTING CHIEF  
U.S. DEPARTMENT OF JUSTICE  
CRIMINAL DIVISION, FRAUD SECTION

By: /s/ William E. Johnston  
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CERTIFICATE OF SERVICE

I hereby certify that on September 7, 2022, I electronically filed the foregoing with the Clerk of the Court of the United States District Court for the District of Nebraska by using the CM/ECF system.

/s/ Tian Huang  
TIAN HUANG